

# United States District Court

FILED

## EASTERN DISTRICT OF MISSOURI

UNITED STATES OF AMERICA

V.

ELIYAHU BARHANUN,  
a.k.a. ELI BARHANUN,  
a.k.a. ELI BARHANIN

(Name and Address of Defendant)

OCT 27 2009  
U. S. DISTRICT COURT  
ST. LOUIS  
CRIMINAL COMPLAINT

CASE NUMBER:  
4:09 MJ 7316 MLM

I, John Jackman, the undersigned complainant being duly sworn state the following is true and correct to the best of my knowledge and belief. On or about July 24, 2009, in St. Louis County, in the Eastern District of Missouri, defendant did,

for the purpose of evading the reporting requirements of 31 U.S.C. § 5325 and any regulation prescribed thereunder, structure or assist in structuring, or attempt to structure or assist in structuring, any transaction with one or more domestic financial institutions, in violation of Title 31, United States Code, Section 5324; and

beginning at some time prior to April 6, 2009, and continuing until on or about October 13, 2009, in St. Louis County, in the Eastern District of Missouri, and elsewhere, the defendant did conspire with other(s) to commit offenses against the United States, including mail and wire fraud in violation of Title 18, United States Code, Sections 1341 and 1343, and money laundering in violation of Title 18, United States Code, Section 1956, and did commit at least one act in furtherance of the conspiracy during the conspiracy, all in violation of 18 U.S.C. § 371.

I further state that I am a Postal Inspector with the United States Postal Inspection Service and that this complaint is based on the following facts:

See Attached Affidavit, which is herein incorporated by reference.

Continued on the attached sheet and made a part hereof.

☒ Yes ☐ No



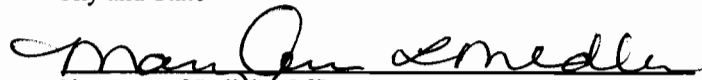
Signature of Complainant  
John Jackman  
Postal Inspector  
United States Postal Inspection Service

Sworn to before me, and subscribed in my presence:

October 30, 2009  
Date

Mary Ann L. Medler  
Chief United States Magistrate Judge  
Name and Title of Judicial Officer

at St. Louis, Missouri  
City and State



Signature of Judicial Officer